

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

MOTOROLA, INC.,)	
)	
Plaintiff,)	
)	
v.)	
)	
LEMKO CORPORATION, XIAOHONG)	
SHENG, SHAOWEI PAN, HANJUAN JIN,)	
XIAOHUA WU, XUEFENG BAI,)	
NICHOLAS LABUN, BOHDAN PYSKIR,)	
HECHUN CAI, JINZHONG ZHANG,)	
ANGEL FAVILA, ANKUR SAXENA,)	Case No. 08 CV 5427
RAYMOND HOWELL, FAYE VORICK,)	
and NICHOLAS DESAI,)	
)	
)	
)	
Defendants.)	Judge Matthew F. Kennelly
)	
* * * * *)	Magistrate Judge Geraldine Soat Brown
LEMKO CORPORATION, SHAOWEI PAN,)	
XIAOHUA WU and XIAOHONG SHENG,)	
)	
Counter-Plaintiffs,)	
)	
v.)	
MOTOROLA, INC.,)	
)	
Counter-Defendant.)	

**MOTOROLA, INC.’S MOTION FOR RECONSIDERATION AND ENTRY OF
PROTECTIVE ORDER**

Plaintiff Motorola, Inc. (n/k/a Motorola Solutions, Inc., and hereafter referred to as “Motorola”), by and through its attorneys, hereby respectfully requests that the Court reconsider and vacate the portion of its June 2, 2011 oral ruling compelling Motorola to produce discovery within 30 days relating to “all source code providing or relating to location based services used in Motorola’s phones or any other products from 2007 to the present, whether created by

Motorola, MMI or any third party.” Motorola further requests a protective order precluding this discovery to the extent it extends beyond position determining entity (“PDE”) technology. Alternatively, Motorola requests an additional 60 days to respond to this request.

In support of its motion, Motorola submits its memorandum in support filed contemporaneously with this motion.

Wherefore, Motorola respectfully requests that this Honorable Court grant its Motion for Reconsideration and Entry for a Protective Order.

Date: June 15, 2011

Respectfully submitted,

By: /s/ Maureen L. Rurka

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CERTIFICATE OF SERVICE

The undersigned certifies that **PLAINTIFF MOTOROLA, INC.'S MOTION FOR RECONSIDERATION AND ENTRY OF PROTECTIVE ORDER** was filed electronically in compliance with the General Order on Electronic Case Filing, Section III(B)(1). As such, these documents were served on all counsel who are deemed to have consented to electronic service. Fed. R. Civ. P. 5(b)(2)(D) and Local Rule 5.9.

Date: June 15, 2011

/s/ Maureen L. Rurka

Attorney for Plaintiff Motorola, Inc.